

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**AMPEREX TECHNOLOGY LIMITED,**

Plaintiff,

v.

**MAXELL, LTD. and  
MAXELL HOLDINGS, INC.,**

Defendants.

**Civil Action No. 2:21-cv-08461-KM-MF**

**NOTICE OF PLAINTIFF'S MOTION  
TO ENJOIN MAXELL'S LATER-  
FILED INFRINGEMENT ACTION**

Judge: Honorable Kevin McNulty

Motion Date: May 17, 2021

**PLEASE TAKE NOTICE** that on May 17, 2021, or as soon thereafter as they may be heard, counsel for Plaintiff Amperex Technology Limited ("ATL") shall move before Hon. Kevin McNulty, U.S.D.J., United States District Court for the District of New Jersey, for an Order enjoining a later-filed suit by Defendant Maxell Holdings, Ltd. ("Maxell") in the U.S. District Court for the Western District of Texas, captioned *Maxell Holdings, Ltd. v. Amperex Technology Limited*, No. 6:21-cv-00347 (W.D. Tex. filed April 8, 2021).

**PLEASE TAKE FURTHER NOTICE** that in support of ATL's Motion, ATL will rely upon its memorandum of law, the Declarations of Phyllis Xiao and Becky L. Caruso and the exhibits thereto, all of which are filed herewith, as well as all pleadings, papers, and records on file in this Action.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: April 15, 2021

Respectfully submitted,

/s/ Becky L. Caruso

Becky L. Caruso (local counsel)

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